

EXHIBIT A

Proposed Form of Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

THE ART INSTITUTE OF PHILADELPHIA
LLC, *et al.*,
Debtors.

Chapter 7
Case No. 18-11535 (LSS)

(Jointly Administered)

GEORGE L. MILLER, Chapter 7 Trustee,
Plaintiff,

v.

Adv. Proc. No. 20-50627 (LSS)

TODD S. NELSON, JOHN R. McKERNAN,
SAMUEL C. COWLEY, EDWARD WEST,
MARK A. McEACHEN, FRANK JALUFKA,
J. DEVITT KRAMER, MARK NOVAD, JOHN
DANIELSON, AND MICK BEEKHUIZEN,
Defendants.

ORDER GRANTING MOTION TO DISMISS THE COMPLAINT

Upon consideration of defendants Todd S. Nelson and Samuel C. Cowley's ("Defendants") *Motion to Dismiss the Complaint* [D.I. ____], filed on September 14, 2020 (the "Motion"); and any opposition and replies thereto; the Court having determined that the legal and factual bases set forth in the Motion establish just cause to grant the relief requested therein; and after due deliberation thereon and good and sufficient cause appearing therefor;

THE COURT HEREBY ORDERS THAT:

1. The Motion is GRANTED in its entirety.
2. The Defendants are dismissed from the Complaint with prejudice.